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7 Attorneys for Defendant  
COUNTY OF SONOMA  
8 TENNIS WICK, TYRA HARRINGTON,  
MARK FRANCESCHI, TODD HOFFMAN,  
9 JESSE CABLK and ANDREW SMITH

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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13  
14 RONALD CUPP, an individual

**Case No. 4:23-cv-01007**

15 Plaintiff,

16 vs.

**SUPPLEMENTAL REQUEST TO  
TAKE JUDICIAL NOTICE IN  
SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS**

17 COUNTY OF SONOMA, a municipal  
18 corporation; et al.

19 Defendants.

Date: 08/17/23  
Time: 2:00 p.m.  
Courtroom: 6, 2nd Floor  
Judge: Jon S. Tigar

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22 \_\_\_\_\_ /  
23 This Supplemental Request for Judicial Notice is brought by Defendants TENNIS  
24 WICK, TYRA HARRINGTON, MARK FRANCESCHI, TODD HOFFMAN, JESSE  
25 CABLK AND ANDREW SMITH, ("Defendants") in connection with their Motion to  
26 Dismiss Complaint, being filed concurrently herewith, which is noticed for hearing on  
27 August 17, 2023. In this request, Defendants ask the Court to take judicial notice of the  
28 facts and documents identified below pursuant to Federal Rule of Evidence 201, as such

1 facts are not subject to reasonable dispute herein and are capable of accurate and ready  
2 determination by resorting to sources whose accuracy cannot reasonably be questioned.

3 Pursuant to this authority, Defendants seek judicial notice of the document  
4 described below and attached hereto:

- 5 11. Quitclaim Deed transferring property from Federal National Mortgage  
6 Association to Ronald Cupp, recorded on February 25, 2019.

7  
8 Dated: June 8, 2023

ROBERT H. PITTMAN, County Counsel

9  
10 By: /s/ Michael A. King

11 Michael A. King  
12 Attorneys for Tennis Wick, Tyra  
13 Harrington, Mark Franceschi, Todd  
14 Hoffman, Jesse Cablk, and Andrew  
15 Smith  
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EXHIBIT 11

2019013843

RECORDING REQUESTED BY  
NexTitle, A Title and Escrow Co.

MAIL TAX STATEMENTS AND  
WHEN RECORDED MAIL TO:  
Ronald Cupp  
150 Raley Town Center Dr. Ste 2512  
Rohnert Park, CA 94928

Official Records of Sonoma County  
Deva Marie Proto  
02/25/2019 10:49 AM  
NEXTITLE - CALIFORNIA

DEED 2 Pgs

Fee: \$27.00  
County Tax: \$338.25  
City Tax: \$616.00



Order No.: NXCA-0309829  
Escrow No.: NXCA-0309829

APN: 134-251-063-000

SPACE ABOVE THIS LINE IS FOR RECORDER'S USE

QUITCLAIM DEED

THE UNDERSIGNED GRANTOR(S) DECLARE(S): DOCUMENTARY TRANSFER TAX IS: \$338.25 City \$616.00

- ☒ Computed on full value of property conveyed, or  
☐ Computed on full value less value of liens or encumbrances  
remaining at time of sale.  
☐ Unincorporated area X City of Santa Rosa

For valuable consideration, receipt of which is hereby acknowledged,

Federal National Mortgage Association

hereby GRANT(S) to

Ronald Cupp, an unmarried man

the real property situated in the County of Sonoma, State of California, more particularly described as follows:

For legal description of the real property herein, see Exhibit A attached hereto and made part hereof.

Dated: 2-20-19

Federal National Mortgage Association

By: Trent Morrison

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF TX )  
COUNTY OF Collin ) ss.

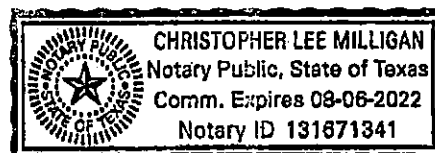
On 2/20/19 before me, Christopher Lee Milligan, Notary  
Public, personally appeared Trent Morrison

who proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



EXHIBIT

MAIL TAX STATEMENTS AS DIRECTED ABOVE

SMITH-000047

APN: 134,251-063-000

**Exhibit A**

FARMS 234, 235 AND 236, AS NUMBERED AND DESIGNATED UPON THE PLAN OF SUBDIVISION OF SANTA ROSA FARMS NO. 3, SONOMA COUNTY, CALIFORNIA, RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF SONOMA COUNTY, CALIFORNIA, ON OCTOBER 9, 1911 IN LIBER 26 OF MAPS, PAGE 15.

ALSO, THAT PART OF LOT 232, DESCRIBED AS COMMENCING AT THE SOUTHWESTERLY CORNER OF SAID LOT; THENCE NORTH 1 DEGREE 31' WEST, ALONG THE DIVIDING LINE BETWEEN LOTS 232, 234 AND 235, A DISTANCE OF 677.87 FEET TO THE SOUTHERLY LINE OF THAT CERTAIN TRACT UNDER AGREEMENT OF SALE MADE BY HARVEY W. BURSON AND BERTHA LILLIAN BODE, BY AGREEMENT DATED AUGUST 30, 1934 AND RECORDED IN LIBER 368 OF OFFICIAL RECORDS, PAGE 265; THENCE ALONG THE SOUTHERLY LINE OF SAID BODE, NORTH 89 DEGREES 28' EAST, 9 FEET; THENCE SOUTH 1 DEGREE 31' EAST, 677.98 FEET TO THE SOUTHERLY LINE OF LOT 232; THENCE ALONG THE SOUTHERLY LINE OF SAID LOT, SOUTH 89 DEGREES 28' WEST, 9 FEET TO THE POINT OF COMMENCEMENT.

EXCEPTING THEREFROM THAT PORTION CONTAINED IN THE DEED FROM WARREN T. PRITCHARD AND DOROTHY L. PRITCHARD, HIS WIFE, TO PETER A. ZARINS, A MARRIED MAN AND JOHN T. ZARINS, AN UNMARRIED MAN, DATED FEBRUARY 1, 1965 AND RECORDED FEBRUARY 24, 1965 IN LIBER 2109 OF OFFICIAL RECORDS, PAGE 923, RECORDER'S SERIAL NO. J-31630, SONOMA COUNTY RECORDS.

ALSO EXCEPTING THEREFROM THAT PORTION CONTAINED IN THE DEED FROM WARREN T. PRITCHARD AND DOROTHY L. PRITCHARD, HIS WIFE, TO EDWARD W. HARTGENBUSH AND MARVIN SOLLAND, TRUSTEES FOR DECILLION ASSOCIATES, DATED FEBRUARY 10, 1965 AND RECORDED MARCH 15, 1965 IN LIBER 2114 OF OFFICIAL RECORDS, PAGE 19, RECORDER'S SERIAL NO. J-34327, SONOMA COUNTY RECORDS.

ALSO EXCEPTING THAT PORTION OF FARMS 234 AND 232, AS DELINEATED UPON "PLAN OF SUBDIVISION OF SANTA ROSA FARMS NO. 3, RECORDED OCTOBER 9, 1911 IN LIBER 26 OF MAPS, PAGE 15, SONOMA COUNTY RECORDS, PARTICULARLY DESCRIBED AS FOLLOWS, TO-WIT:

BEGINNING AT A POINT ON THE WESTERLY POINT OF SAID FARM NO. 234, DISTANT THEREON 303.00 FEET NORTHERLY FROM THE SOUTHWEST CORNER OF FARM 234; THENCE SOUTHERLY ALONG SAID WESTERLY LINE 303.00 FEET TO SAID SOUTHWEST CORNER; THENCE EASTERLY ALONG THE SOUTH-SOUTHERLY COMER COMMON TO SAID FARMS 234 AND 232; THENCE ALONG THE SOUTHERLY LINE OF SAID FARM 232, NORTH 89 DEGREES 28' EAST, 9 FEET; THENCE NORTH 1 DEGREE 31' WEST, 303.00 FEET; THENCE WESTERLY IN A DIRECT LINE 659.76 FEET MORE OR LESS, TO SAID POINT OF BEGINNING.

SMITH-000048